

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Cause No. 18 CR 2945 WJ
	§	
SIRAJ IBN WAHHAJ, et al.,	§	
	§	
Defendants.	§	

UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE REPLY

SIRAJ IBN WAHHAJ, Defendant, by and through his appointed counsel, Marc H. Robert and Thomas Clark, respectfully moves this Court for an extension of time to file a reply to the Government's response to Defendants' joint motion to compel production of CIPA material, and in support of this motion would respectfully show the Court as follows:

1. Defendants' joint motion to compel production of CIPA materials was filed on March 31, 2023 [Doc. 702]. Mr. Wahhaj filed a joinder with a request for additional material on May 1, 2023 [Doc. 733]. The Government responded to the joint motion on May 5, 2023 [Doc. 741]. Defendants' reply is due on May 19, 2023. Counsel for Subhanah Wahhaj filed an unopposed motion to extend the

due date for filing their reply to the Government's response for seven (7) days [Doc. 757]. The Court granted that motion on May 19, 2023 [Doc. 762].

2. Mr. Wahhaj has filed a motion seeking leave to proceed *pro se* [Doc. 745]. Mr. Robert followed that filing with a motion seeking leave to withdraw from Mr. Wahhaj's representation [Doc. 746]. Those motions are pending.

3. The undersigned counsel need a short extension of time to complete and file a reply on Mr. Wahhaj's behalf. Accordingly, counsel request a similar, seven (7) day extension of time for the filing of Mr. Wahhaj's reply.

4. The undersigned counsel has conferred with counsel for the Government regarding this motion. The Government does not oppose the relief requested.

WHEREFORE, SIRAJ IBN WAHHAJ , Defendant, respectfully requests this Court enter an Order extending the due date for Defendant's filing of a reply to the Government's response to Defendants' joint motion to compel production of material pursuant to the CIPA to Friday, May 26, 2023, and providing for such other and further relief to which the Court may find the parties to be justly entitled.

Respectfully Submitted,

/s/ *Electronically filed on 5/23/23*

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